



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

MEMORANDUM

July 15, 2010

Kevin King, LEP
Environmental Resources Management (ERM)
77 Hartland Street, Suite 300
East Hartford, CT 06108

Re: September 2006 Quality Assurance Project Plan Response to EPA Comments
Former CEE Associates/InteliData Facility, 80 Pickett District Road, New Milford, CT
CTD044121697

Dear Mr. King:

Thank you for providing the response to EPA's comments regarding the Quality Assurance Project Plan (QAPP) for ongoing activities at the Former CEE Associates/InteliData facility. The purpose of this letter is to provide EPA's comments on the document. EPA's comments are as follows:

Comments on QAPP Response to Comments Document date June 24, 2010

1. Comment #1 O&M of Soil Vapor Extraction/Air Sparge System

The requested figures were submitted. What is unclear in the Figures 12 and 13 are the sampling locations. If samples are to be collected from SVE System the sampling locations need to be clearly identified.

2. Comment #5 Table 6 which deals with preservation of 1,4-dioxane groundwater samples.

According to ERM's Response, the action limit for 1,4-dioxane is 20 ug/L. In that case, 1,4-dioxane analysis can be included with the VOC analyses.

However, if the action limit is reduced to below 20 ug/L in the future, then the sample will need to be analyzed by Method 8260C which requires purging the sample at 80°C and collecting a separate sample for the analysis. The 1,4-dioxane sample is not preserved with HCl because the 1,4-dioxane which is an ether can degrade at that purging temperature under acid conditions, thus biasing the data low.

3. Comment #6 Appendix F ERM Standard Operating Procedures Low Flow Sampling Procedure.

According to ERM Response they will use the USEP Region 1 Draft Calibration of Field Instruments (temperature, pH, dissolved oxygen, conductivity/specific conductance, oxidation/reduction potential [ORP], and turbidity), June 3, 1998 procedure as requested.

Since the review of the September 2006 Quality Assurance Project Plan the draft procedure has been updated in January 2010 (see attachment). Also, the EPA Region 1's 1996 Low Flow Sampling procedure has been updated in January 2010 (see attachment). Note there are no major changes in the updates just clarifications and additional information added to improve the procedures. Please use the updated revision instead of the earlier revisions.

4. Comment #8 which deals with well screens or open intervals greater than ten feet.

ERM states the following: "The data from geophysical studies indicate that very little preferential flow is present in the bedrock, suggesting no optimal "worst-case" sampling interval is present. Continued sampling at the midpoint of the borehole or screen section will provide comparability with historical data." Since you stated that there is "no optimal sampling interval" to collect the samples, the well should be purged at least one screen/open interval volume before the samples are collected using the low-flow sampling procedure. This will help ensure that water from the whole screen/open interval is reaching the pump intake before the samples are collected.

5. Comment #8 and MW-17

ERM states "MW-17 has been destroyed and is no longer included in the monitoring program". Table 6 which is attached to ERM's Response shows MW-17 as part of the monitoring program. MW17 should either be removed from the table or footnoted as being destroyed.

Please provide the requested revisions to the QAPP to EPA and CT DEP within 20 days of the date of this letter. The revisions may be provided as a QAPP addendum to avoid the need to regenerate the entire QAPP.

If you have any questions on my review, please contact me at (617) 918-1617 or email me at stfleur.marilyn@epa.gov.

Sincerely,



Marilyn St. Fleur
RCRA Facility Manager

Enclosure

cc: C. Porfeit, EPA
G. Shteynberg, CT DEP